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February 22, 2022

**BY EMAIL & ECF**

Hon. Loretta A. Preska  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Courtroom 12A  
New York, New York 10007-1312

Re: *Aurelius Capital Master, Ltd., et al. v. The Republic of Argentina*,  
Nos. 19 Civ. 351 (LAP), 19 Civ. 9786 (LAP), 19 Civ. 10109 (LAP),  
19 Civ. 10131 (LAP), and 19 Civ. 11338 (LAP) (S.D.N.Y.)

Dear Judge Preska:

We write on behalf of plaintiffs (“Plaintiffs”) in the above-referenced actions. During the February 15, 2022 conference, the Court directed the parties to confer and submit a proposed amendment of the pre-trial schedule. Unfortunately, the parties have not been able to reach agreement, and have agreed to submit to the Court their respective final proposals that were exchanged today. Exhibit A sets forth the current dates per the Court’s April 26, 2021 Order, and the parties’ respective proposals to amend those dates.

The Republic contends that it needs nearly three more months (from today) to complete document production. Plaintiffs believe this extension is excessive, but are prepared to be accommodating and are proposing a date just two weeks earlier than the Republic’s date. Plaintiffs have two major concerns, however. First, the Republic is proposing a four-month extension of the date for completing fact depositions, when three months is more than sufficient. Second, the Republic is refusing to accept any shortening of the intervals for expert rebuttal and reply reports and the completion of expert discovery—which, per Plaintiffs’ proposal, would enable the parties to maintain the September 30, 2022 end date for all discovery. Ultimately, the Republic seeks to extend the completion of discovery by over two and half months, which is unwarranted and unfairly penalizes Plaintiffs. Especially with the long extension requested by the Republic for document production, the parties will have ample time to prepare for and complete all fact and expert discovery and advance these actions towards trial.

Hon. Loretta A. Preska

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Respectfully submitted,

*s/ Edward A. Friedman*  
Edward A. Friedman

Enclosure

cc: Chambers (by email)  
All counsel of record in the GDP Actions (by ECF and email)

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**Exhibit A**

<b>Event (exactly as described in Court Order dated 04/26/2021)</b>	<b>Current Schedule (per Court Order dated 04/26/2021)</b>	<b>Republic's Proposal</b>	<b>Plaintiffs' Proposal</b>
Parties to complete document discovery by:	12/15/2021	05/13/2022	04/29/2022
Parties to complete fact witness depositions by:	3/31/2022	07/29/2022	06/30/2022
Parties to serve Requests for Admission by:	3/31/2022	06/29/2022	05/31/2022
Completion of fact discovery by:	4/29/2022	07/29/2022	06/30/2022
Parties to designate expert witnesses and serve Rule 26(a)(2) disclosures by:	6/15/2022	08/17/2022	07/15/2022
Parties to designate rebuttal experts and serve Rule 26(a)(2) disclosures by:	7/29/2022	09/30/2022	08/19/2022
Parties to serve expert reply reports by:	8/31/2022	10/31/2022	09/09/2022
Completion of expert discovery by:	9/30/2022	12/16/2022	09/30/2022